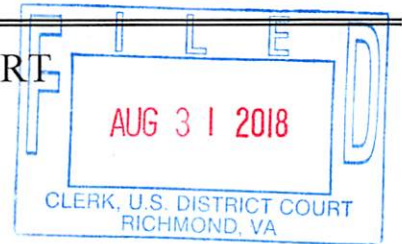


AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia



United States of America
v.
JUAN ARGUETA MARQUEZ,

Case No.

3:18MJ151

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 14, 2017 in the county of Richmond in the
Eastern District of Virginia, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. Section 1542
18 U.S.C. Section 1546
18 U.S.C. Section 911

False statement in a passport application
Fraud and misuse of visas, permits, and other documents
False claim to citizenship

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Complainant's signature

D.S.S. S.A. Michael Hubert

Printed name and title

Sworn to before me and signed in my presence.

Date:

8/31/2018

City and state:

Richmond, VA

/s/

Roderick C. Young
United States Magistrate Judge

Printed name and title

knowingly and unlawfully make false statements in an application for a United States passport, with the intent to secure issuance of such passport, in violation of 18 United States Code, Section 1542. Specifically, I have obtained evidence that Juan Argueta Marquez knowingly falsified a passport application by using a counterfeit Permanent Residence Card (PRC) and falsely claimed to be a United States Citizen on the application during execution.

5. On February 14, 2017 passport applications #xxxxxxx75 and #xxxxxxx76 were submitted on behalf of "K.Y.D.-A." and "A.A.D." by their purported parents at the Lakeside Post Office in Richmond, Virginia, in the Eastern District of VA. Purported father Juan Argueta MARQUEZ was present at the time of execution, offered a Permanent Resident Card (PRC), with the Alien number xxxxxx254, as his proof of identity, and claimed US Citizenship on the passport application. The applicant swore to the veracity of, and signed the application, authorizing the United States Department of State to issue a U.S. Passport to his two children.
6. At the time each passport application was executed, the Acceptance Agent identified that the PRC was counterfeit due to the appearance of incorrect security features on the card which triggered an investigation by the Department of State.
7. Person Centric Query checks show the Alien Number (A#xxxxxxx254) serialized on the PRC card submitted by Juan Argueta Marquez, is not associated with him and instead belongs to "V.D.". A search on the Juan Argueta Marquez's full name and DOB returned A#xxxxxxx986. Additionally, USCIS reviewed a copy of the PRC and determined the receipt number on the document (WAC0xxxxxxx597) does not exist in the USCIS system and that it appears to be completely fabricated.
8. On June 23, 2017, Special Agents with DSS assigned to the Philadelphia Resident Office interviewed "V.D." and confirmed that the Alien Number presented by Juan Argueta MARQUEZ on the counterfeit PRC was in fact assigned to "V.D."
9. Consular Consolidated Database records show that the last action on Juan Argueta Marquez's Alien Number was on February 6, 2008 when a notice was sent to him indicating that his petition for asylum was denied. The counterfeit PRC presented with the passport applications falsely claimed an issuance of September 2, 2008.
10. Juan Argueta Marquez has violated Title 18, United States Code, Section 1542 (False statement in a passport application), Title 18 United States Code Section 1546 (Fraud and misuse of visas, permits, and other documents), and Title 18 United States Code Section 911 (False claim to citizenship), in that he made false statements in an application for a United States Passport by representing himself as having current legal alien status and making claims to being a U.S. Citizen, and while knowing said statements to be false, he willfully and knowingly used a forged identification to aid the unlawful activity with the intent to secure the issuance of a passport pursuant to the rules prescribed pursuant to such laws under the authority of the United States.

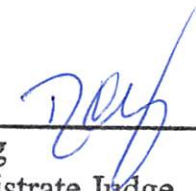
11. Wherefore, I respectfully request that this Court issue a criminal complaint charging Juan Argueta Marquez with violations of Title 18, United States Code, Section 1542 (False statement in a passport application), Title 18 United States Code Section 1546 (Fraud and misuse of visas, permits, and other documents) and Title 18 United States Code Section 911 (False claim to citizenship), and an arrest warrant for Juan Argueta Marquez.



Michael Hubert
Special Agent, DSS

Sworn and subscribed to before me August 31, 2018, at Richmond, Virginia.

/s/



Roderick C. Young
United States Magistrate Judge